

October 4, 2024

VIA ECF

Honorable Lorna G. Schofield  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: 1. *Bodea v. JPMorgan Chase & Co. et al*, Docket No. 1:24-cv-06404  
2. *Lopez v. JPMorgan Chase & Co. et al*, Docket No. 1:24-cv-06489

Dear Judge Schofield:

As set forth in the accompanying Stipulation and Proposed Order, the Parties respectfully move the Court for an Order consolidating the above-captioned actions (the “Actions”) and setting a time to apply for interim class counsel (*see* ECF No. 19, 24).

The Actions arise out of similar operative facts and assert similar legal claims against Defendants, including, among other things, that Defendants breached their fiduciary duties and contractual obligations to Plaintiffs and proposed Class members with respect to their cash sweep program.

The Parties agree that consolidation of the Actions meets the requirements of Rule 42(a) of the Federal Rules of Civil Procedure and that the consolidation of the Actions will promote the fair and efficient administration of the Actions and avoid unnecessary duplicative efforts. However, Defendants expressly reserve all rights to challenge whether the Actions state legally cognizable claims or may be properly brought as class actions pursuant to Rule 23 of the Federal Rules of Civil Procedure.

The Parties also agree that the establishment of a time for the filing of applications for appointment of Interim Class Counsel pursuant to Rule 23(g) of the Federal Rules of Civil Procedure is warranted for the fair and efficient management of the Actions.

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Respectfully submitted,

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